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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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10 UNITED STATES OF AMERICA,

11 Plaintiff,  
12 vs.

13 NAM VIET NGUYEN,

14  
15 Defendant.

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Case No.: 2:18-cr-00291-JAD-BNW

**STIPULATION AND PROPOSED  
ORDER TO CONTINUE**  
(First Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between The United States  
17 of America, through Christopher Chiou, Acting United States Attorney, and Shaheen  
18 Torgoley, Assistant United States Attorney, counsel for the United States of America, and  
19 Shawn R. Perez, Esq., counsel for Nam Viet Nguyen, that the sentencing currently scheduled  
20 for December 13, 2021, be vacated and continued to a date and time convenient to the Court,  
21 but no sooner than 30 days past the date originally set for sentencing.

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23 This stipulation is entered into for the following reasons:

24 1. The Defendant is in custody and does not object to the continuance.  
25 2. The parties agree to the continuance.  
26 3. The presentence interview was originally scheduled for September 24, 2021 with  
27 USPO Erica Strome. Unfortunately due to an unforeseen family emergency, Ms. Strome had  
28 to travel to Kansas and will not return until October 11, 2021. The report is currently due on

1      October 21, 2021.

2      4.      This request is being made to accommodate Ms. Strome's family emergency and to  
3      allow her ample time to complete her investigation and report.

4      5.      The additional time requested herein is not sought for purposes of delay, but merely  
5      to accommodate all parties by allowing the investigation and preparation of the report to be  
6      done more thoroughly. Denial of this request could result in the miscarriage of justice.

7      6.      This is the first stipulation to continue the date set for sentencing.

8      DATED this 24<sup>th</sup> day of September, 2021.

9      /s/ *Shawn R. Perez, Esq.*  
10     SHAWN R. PEREZ, ESQ.  
10     Counsel for Defendant,  
11     Nam Viet Nguyen

Christopher Chiou  
Acting United States Attorney

By: /s/ *Shaheen Torgoley*  
SHAHEEN TORGOLEY  
Assistant United States Attorney

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Case No.: 2:18-cr-00291-JAD-PAL

Plaintiff,

VS.

NAM VIET NGUYEN,

Defendant.

## **FINDINGS OF FACT**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

13 || 1. The Defendant is in custody and does not object to the continuance.

14 2. The parties agree to the continuance.

15 3. The presentence interview was originally scheduled for September 24, 2021 with  
16 USPO Erica Strome. Unfortunately due to an unforeseen family emergency, Ms. Strome had  
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20 allow her ample time to complete her investigation and report.

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22 to accommodate all parties by allowing the investigation and preparation of the report to be  
23 done more thoroughly. Denial of this request could result in the miscarriage of justice.

24 6. This is the first stipulation to continue the date set for sentencing.

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## ORDER

IT IS THEREFORE ORDERED, that the Sentencing Hearing set for December 13, 2021 be vacated and reset to January 31, 2022, at 11:00 a.m.

IT IS SO ORDERED this 27th day of September, 2021.

UNITED STATES DISTRICT JUDGE